

May 14, 2001

The Honorable Christine Todd Whitman
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

Subject: Comments on 1,3,5-Trioxolane

Dear Administrator Whitman:

The following comments on the test plan for 1,3,5-Trioxolane are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These animal protection and environmental organizations have a combined membership of more than nine million Americans.

The Trioxolane Manufacturers' Consortium has presented robust summaries that adequately address each health endpoint of the SIDS battery and therefore appropriately has not called for more tests. 1,3,5-Trioxolane has been tested on many animals, and any further testing on animals would not contribute to the understanding of its toxicity. We commend the Consortium's thoughtful and comprehensive analysis of existing data.

Sincerely,

Nicole Cardello, M.H.S.
Staff Scientist